

JAMES W. PUZEY, ESQ.
Nevada Bar No. 5745

AUDREY DAMONTE, ESQ.
Nevada Bar No. 4244

HOLLEY DRIGGS
800 S. Meadows Parkway
Reno, Nevada 89521
Telephone: 775/851-8700
Facsimile: 775/851-7681

RONALD J. THOMPSON, ESQ.
Nevada Bar No. 5524

ADAM J. PERNSTEINER, ESQ.
Nevada Bar No. 7862

E-mail: apernsteiner@nevadafirm.com

HOLLEY DRIGGS
300 South Fourth Street, Suite 1600
Las Vegas, Nevada 89101
Telephone: 702/791-0308

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHUSHAN SADJADI, an individual,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
MARBELLA ALFONZO, an individual;
MATTHEW SPURK, an individual; PATRICIA
CHANDLER, an individual; RAY NEGRETE,
an individual; REBECCA LUCERO, an
individual; CHRIS GREATHOUSE, an
individual, and DOES 1-X, inclusive;
Defendants.

CASE NO.: 2:24-cv-00079

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO FILE
RESPONSE TO FIRST AMENDED
COMPLAINT**

(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by the parties, through undersigned
counsel, pursuant to LR IA 6-1, 6-2, and LR 7-1, and subject to the approval of the Court, that:

1. The deadline to Answer Plaintiff's First Amended Complaint is extended from
March 25, 2024 up through and including April 8, 2024;
2. On March 15, 2024, the parties submitted a Stipulation and [Proposed] Order to

1 Extend Time to File Response to First Amended Complaint from March 18, 2024
2 to March 25, 2024, which was adopted by the Court in its Order [ECF No. 18] of
3 March 18, 2024.

- 4 3. On March 20, 2024, the counsel for Defendants became aware of and began
5 investigating a potential conflict in connection with their joint representation of all
6 of the named Defendants.

7 ///

8 ///

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

4. The parties have agreed to request this additional extension as a professional courtesy in order to facilitate the aforementioned investigation by Defendants' counsel and hereby submit that this request is not for any purposes of undue delay.

5. This stipulation is without prejudice to or waiver of any parties' rights and arguments with respect to the foregoing forthcoming pleading.

Dated this 25th day of March 2024

IT IS SO AGREED AND STIPULATED

HOLLY DRIGGS

By: /s/ Brian K. Berman
Brian K. Berman, Esq.
721 Gass Avenue
Las Vegas, NV 9101
Tel. (702) 382-0702
Email: amehdi@spencerfane.com
Attorneys for Plaintiff

By: /s/ Adam J. Pernsteiner
JAMES W. PUZEY, ESQ.
Nevada Bar No. 5745
AUDREY DAMONTE, ESQ.
Nevada Bar No. 4244
800 S. Meadows Parkway
Reno, Nevada 89521
Telephone: 775/851-8700
Facsimile: 775/851-7681

RONALD J. THOMPSON, ESQ.
Nevada Bar No. 5524
ADAM J. PERNSTEINER, ESQ.
Nevada Bar No. 7862
300 South Fourth Street, Suite 1600
Las Vegas, Nevada 89101
Telephone: 702/791-0308

Attorneys for Defendants.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 25, 2024